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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 ELISEO NAPOLES, MARIE NAPOLES  
11 AND M.N., A MINOR, BY AND  
12 THROUGH HIS GUARDIAN AD LITEM,

12 Plaintiffs,

13 vs.

14 CLARK COUNTY SCHOOL DISTRICT,  
15 DOES I through X, inclusive; ROE  
16 CORPORATIONS I through X, inclusive

16 Defendant.

CASE NO: 2:19-cv-01474-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFFS TO  
RESPOND TO DEFENDANT'S MOTION  
FOR SUMMARY JUDGMENT  
(First Request)**

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18 COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A  
19 MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and  
20 through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK  
21 COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe  
22 V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of  
23 the General Counsel, do hereby stipulate and agree to extend time for Plaintiffs to respond to  
24 Defendant's Motion For Summary Judgment (ECF #35). This request is submitted pursuant to  
25 LR IA 6-1, 6-2 and LR II 7-1 and is the parties' first request for an extension of time for  
26 Plaintiffs to respond to Defendant's Motion for Summary Judgment.  
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Good cause exists for this extension, as Plaintiffs' counsel needs to confer with his clients regarding the facts of the attendant motion. As Plaintiffs' first language is Spanish and their understanding of English is very poor, a translator is required which will nearly double the time to confer with Plaintiffs.

In addition, the parties have been exploring settlement negotiations.

Accordingly, Plaintiff shall have up to and including September 10, 2021, to respond to Defendant's Motion for Summary Judgment (ECF #35). Defendant's reply to Plaintiffs' response will be adjusted accordingly.

Dated: August 26, 2021

HATFIELD & ASSOCIATES, LTD.

*/s/ Trevor J. Hatfield*

By: \_\_\_\_\_  
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*Attorney for Plaintiffs*

Dated: August 26, 2021

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

*/s/ Crystal J. Herrera*

By: \_\_\_\_\_  
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*Attorneys for Clark County School District*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT COURT JUDGE

DATED: August 27, 2021  
2:19-cv-01474-APG-BNW

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